Comments pertaining to RM-10867 as submitted by the American Radio Relay League (ARRL).

The ARRL attempts to solve their perceived notion that amateur radio is becoming extinct and that new operators must be recruited at any cost! First, there is no hard evidence that in terms of numbers, the amateur radio population has not grown. The greatest growth has been in the UHF/VHF regions where the 'new' breed of Technician operators satisfy their need to 'communicate'. Most of these operators oppose the MORSE CODE requirement for testing and their rationale for supporting this proposal is based upon a myopic view, at best.

The Amateur Radio Service has always been justified because it was a pool of trained operators whose emergency communications skills could be counted on in a national or regional emergency. A vital part of providing emergency communications includes the ability to communicate with SIMPLE means (such as morse code) AND the ability to build/create simple radio communication devices from available parts.

For the most part, the current Technician licensee is neither able to communicate with simple means such as morse code or the ability to build a simple radio transmitter or receiver. The current Technician licensee has become the defacto entry class license. It has served the purpose of introducing individuals to ham radio. For many, their only real interest is to communicate, in short, a glorified CB operator.

The ARRL proposal wishes to grandfather all current Technician licensees to the General Class license without further testing or evaluation. This would place these individuals in the MAINSTREAM of ham radio on the HF frequency allocations where they have had little if any experience or skill in HF procedures and theory. I am opposed to any plan that supports such an action.

The ARRL proposal wishes to eliminate the morse code requirement for the General class license. As stated previously, I believe the morse code is an important requirement for providing emergency communications. This is particularly important during this time of need for homeland security.

While the recent WARC meetings may have eliminated the 'requirement' for morse code, it also stated clearly that each government should decide upon the merit of morse code. I am in favor of keeping the current morse requirements for General and Extra. I see no morse requirement for the entry level class of license.

In keeping with our justification for existance, I believe that the technical standards for admission into amateur radio should remain reasonably high. I believe the publication of question POOLS has degraded the pool of technically qualified amateur radio operators by allowing rote memorization for testing. I believe an applicant for an amateur radio license should demonstrate a reasonable understanding of the theory relevant to the class of license being sought. Questions and answers for the written portion of the test should not be published in advance.

I believe it would better serve the amateur radio community, the FCC and government of the United States to retain the Technician class of license as the defacto entry level license, but extend to them a SMALL portion of controlled HF space to allow them to experience HF radio and to gain some experience before being placed in the mainstream of ham radio. RM-10868 submitted by the RAF accomplishes this!

The ARRL claims that they represent all of its membership and all of those that are not members, yet the ARRL has made no effort to ascertain the opinion of either its membership or those non-members whom they claim to represent. I do NOT support the ARRL proposal.

RM-10867 is an appeasement. It offers too much to those willing to put forth too little.

It attempts to attract membership from those who would support the ARRL simply because it makes becoming an amateur radio operator a piece of cake.

Amateur Radio operators have contributed much to our country. The accomplishments have depended upon retaining a trained pool of SKILLED operators who can function under adverse conditions. Eliminating the requirement for morse code and the continued degradation of technical competence will do nothing to justify the existence of amateur radio.

Please disapprove RM-10867 and give serious consideration to RM-10868 by the RAF.

Respectfully yours,

Robert Raymond, W7RJR